



California Regional Water Quality Control Board

San Diego Region



Alan C. Lloyd, Ph.D.
Secretary for
Environmental
Protection

Over 50 Years Serving San Diego, Orange, and Riverside Counties
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Arnold Schwarzenegger
Governor

9174 Sky Park Court, Suite 100, San Diego, California 92123-4340
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<http://www.waterboards.ca.gov/sandiego>

January 28, 2005

CERTIFIED - REGISTERED MAIL

7004 0750 0000 7625 2320

Mr. H.W. Newton
Manager, Site Support Services
Southern California Edison
P.O. Box 128
San Clemente, CA 92674

In reply refer to:
IC: 13-0088.01

Dear Mr. Newton:

SUBJECT: TENTATIVE NPDES RENEWAL PERMITS FOR THE SOUTHERN CALIFORNIA EDISON (SCE), SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3, ORDER NOS. R9-2005-0005 AND R9-2005-0006 (NPDES PERMIT NOS. CA0108073 AND CA0108181)

Enclosed for your review are copies of tentative Order Nos. R9-2005-0005 and R9-2005-0006, Waste Discharge Requirements for Southern California Edison (SCE), San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, San Diego County, the tentative Monitoring and Reporting Programs, and the Fact Sheet for the tentative Orders. The tentative Orders renew the NPDES permits for SONGS Units 2 and 3 for another five years.

The tentative Orders are also available on our website at www.waterboards.ca.gov/rwqcb9.

The waste discharge requirements and monitoring requirements contained in both tentative Orders are virtually identical, since both Units 2 and 3 have the same electrical outputs (i.e. 1085 MW), maximum discharge flow-rates (i.e. 1,287 mgd), and constituents in their effluent. Effluent from both Units consists primarily of once-through cooling water, with small volumes of other in-plant waste streams. The effluent from Units 2 and 3 is discharged to the Pacific Ocean via individual ocean outfalls (i.e. Outfalls 002 and 003).

SONGS Unit 1 is subject to waste discharge requirements established by Order No. 2000-04. Currently SCE is permitted to discharge the effluent from Unit 1 to Outfall 001 or route the effluent to Outfalls 002 or 003. SCE has reported it will terminate the use of the Outfall 001 sometime in 2005. At that time all effluent from Unit 1 will be routed exclusively to Outfalls 002 or 003. The Regional Board has determined that it would be appropriate not to renew the NPDES permit for Unit 1 when it expires on February 9, 2005. Order No. 2000-04 will instead continue to be enforced administratively until such time that the Discharger notifies the Regional Board that it has terminated the use of Outfall 001. The Regional Board will consider rescinding Order No. 2000-04 at that time.

California Environmental Protection Agency

Tentative Order Nos. R9-2005-0005 and R9-2005-0006 both acknowledge the impending termination of flows from Unit 1 to Outfall 001 and the routing of flows from Unit 1 to Outfalls 002 or 003. Both tentative Orders are structured to account for effluent limitations and monitoring requirements as a result of the potential routing of Unit 1 flows to Outfalls 002 or 003.

The effluent limitations for toxics and discharge prohibitions in the tentative Orders have been derived from the 2001 California Ocean Plan. The effluent limitations in the existing Orders for Units 2 and 3 (i.e. Order Nos. 99-47 and 99-48) were based on the 1997 version of the Ocean Plan. The Regional Board, in consultation with the SWRCB staff, has concluded that an acute toxicity limitation is not required for discharges from Outfalls 002 and 003. The tentative Orders, however, do include chronic toxicity limitations, which are consistent with 2001 Ocean Plan requirements.

The tentative Orders discontinue the requirement for the Discharger to conduct periodic offshore transmissivity monitoring. The Regional Board has reviewed over five years of data for transmissivity receiving water monitoring data and has determined that the discharges through Outfalls 002 and 003 do not cause a reduction in natural light transmission at any point outside the zone of initial dilution from the Outfalls.

Order Nos. 99-47 and 99-48, through Addendum No. 1 (adopted August 30, 2000), required the Discharger to conduct coliform and enterococcus monitoring at two offshore and two surfzone receiving water stations in the vicinity of Outfall 001. The Regional Board has reviewed bacterial monitoring data submitted by the Discharger and has determined that bacterial contamination is not a significant component of the discharge through Outfall 001. To date, no samples collected in the vicinity of the Outfall 001 have shown elevated bacteria levels that exceed water quality criteria of the Ocean Plan. Furthermore, bacteriological monitoring is already conducted by the San Diego County Department of Health near the SONGS facility. The tentative Orders, therefore, do not require a receiving water, bacterial monitoring program.

Pursuant to Section 125.95(b)(1) of the CWA 316(b) *Phase II* rule for intake structures, the tentative Orders require that SCE perform a *Comprehensive Demonstration Study* to confirm that the intake structures of Units 2 and 3 meet the performance standards and Best Technology Available (BTA) requirements of the *Phase II* rule. The provisions, compliance requirements, and compliance schedules for the *Phase II* rule have been incorporated into tentative Order Nos. R9-2005-0005 and 2005-0006.

The tentative Orders do not authorize any new discharges. Furthermore, effluent concentration and mass emission rate limitations in these Orders (including thermal Delta limitations and limitations for low-volume wastes) are the same or more stringent than those in Order Nos. 99-47 and 99-48. All monitoring frequencies and reporting requirements contained in the tentative Orders are also the same or more stringent than those in Order Nos. 99-47 and 99-48.

Mr. H.W. Newton
Southern California Edison
Tentative Order Nos. R9-2005-0005 and R9-2005-0006

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January 28, 2005

Regional Board staff intends to bring tentative Order Nos. R9-2005-0005 and R9-2005-0006 before the Regional Board for its consideration at its March 9, 2005 meeting. This meeting is open to the public and will begin at 9:00 a.m. at the Regional Board Meeting Room, 9174 Sky Park Court, Suite 100, San Diego, California.

Please review and provide written comments on the tentative Orders at your earliest convenience. We encourage you to send written comments via email or mail to the Regional Board office by February 25, 2005. This will provide the time needed to develop responses to comments on the tentative Orders so that the written responses can be furnished to the Regional Board members for review prior to the March 9, 2005 hearing. Written comments received after 5:00 p.m. on March 2, 2005 will not be provided to the Regional Board members prior to the hearing. Oral comments will be received by the Regional Board during the March 9, 2005 hearing.

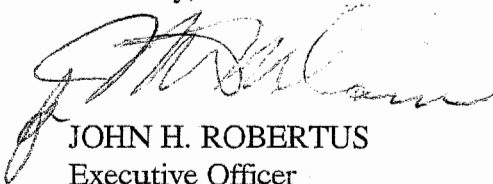
Please address all correspondence to:

Mr. John Robertus, Executive Officer
Attn: Industrial Compliance Unit
California Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

The heading portion of this letter includes a Regional Board code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence and reports to the Regional Board pertaining to this matter.

Please direct comments and questions to Mr. Hashim Navrozali at (858) 467-2981 or via e-mail to hnavrozali@waterboards.ca.gov.

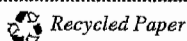
Sincerely,



JOHN H. ROBERTUS
Executive Officer

Enclosures: Tentative Order Nos. R9-2005-0005 and R9-2005-0006 w/Attachments.
cc: Government Agencies and Interested Parties Distribution Lists
Files: 13-0087.01 and 13-0088.01
JHR:mpm:jrp:hn

California Environmental Protection Agency



**Government Agencies and Primary List
For
Tentative Order Nos. R9-2005-0005 and R9-2005-0006**

(Include Cover Letter and Tentative Orders)

California Energy Commission
1516 Ninth St.
Sacramento, CA 95814-2950
Attn: Joe O'Hagan

National Oceanic and Atmospheric Administration
National Marine Fisheries Service
501 W. Ocean Blvd., Suite 4200
Long Beach, CA 90802-4213
Attn: Robert Hoffman

U.S. Fish and Wildlife Services
Ecological Services
6010 Hidden Valley Road
Carlsbad, CA 92009
Attn: Scott Sobiech

California Department of Fish & Game
Environmental Services Division
4949 Viewridge Avenue
San Diego, CA 92123
Attn: Bill Paznokas

California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Attn: Jim Detmers

California Coastal Commission
7575 Metropolitan Dr. Suite 103
San Diego, CA 92108-4402
Attn: Sharilyn Sarb

Southern California Coastal Water Research Project
7171 Fenwick Lane
Westminster, CA 92683
Attn: Ken Schiff

U.S. Environmental Protection Agency
Region IX
WTR #5
75 Hawthorne Street
San Francisco, CA 94105
Attn: Douglas Eberhardt

U.S. Marine Corps Base Camp Pendleton
Environmental Security
P.O. Box 555008
Camp Pendleton, CA 92055-5008
Attn: Lupe Armas

County of Orange
1750 South Douglass Road
Anaheim, CA 92806
Attn: Grant Sharp

City of San Clemente
910 Calle Negocio, Ste. 100
San Clemente, CA 92673
Attn: Brandi Outwin, P.E.

San Diego Gas and Electric
8315 Century Park Court
CP21E
San Diego, CA 92123-1548
Attn: Scott Peterson

San Diego BayKeeper
2924 Emerson Street, Suite 220
San Diego, CA 92106
Attn: Bruce Reznik

San Diego Audubon Society
4891 Pacific Highway, Suite 112
San Diego, CA 92110
Attn: James A. Peugh

Sierra Club
San Diego Chapter
3820 Ray Street
San Diego, CA 92104-3623
Attn: Ed Kimura

Environmental Health Coalition
401 Mile of Cars Way, Suite 310
National City, CA 91950-0220
Attn: Albert Huang